

JAMIE LYNN GALLIAN
16222 Monterey Lane Space 376
Huntington Beach, CA 92649
714-321-3449
jamiegallian@gmail.com

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

IN RE JAMIE LYNN GALLIAN
DEBTOR,

Case No.: 8:21-BK-11710-SC

REPLY
DATE DECEMBER 17, 2024
TIME: 2:30 PM
PLACE: 5C
411 WEST FOURTH STREET SANTA ANA,
CA 92701

B. Section 522(f).

Section 522(f) provides in relevant part:

(f)(1) Notwithstanding any waiver of exemptions but subject to paragraph (3), the debtor may avoid the fixing of a lien on an interest of the debtor in property to the extent that such lien impairs an exemption to which the debtor would have been entitled under subsection (b) of this section, if such lien is--

(A) a judicial lien, other than a judicial lien that secures a debt of a kind that is specified in section 523(a)(5); or

(B) a nonpossessory, nonpurchase-money security interest in any--

(i) household furnishings, household goods, wearing apparel, appliances, books, animals, crops, musical instruments, or jewelry that are held primarily for the personal, family, or household use of the debtor or a dependent of the debtor;

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(ii) implements, professional books, or tools, of the trade of the debtor or the trade of a dependent of the debtor; or

(iii) professionally prescribed health aids for the debtor or a dependent of the debtor.

(2)(A) For the purposes of this subsection, a lien shall be considered to impair an exemption to the extent that the sum of--

(i) the lien;

(ii) all other liens on the property; and

(iii) the amount of the exemption that the debtor could claim if there were no liens on the property; exceeds the value that the debtor's interest in the property would have in the absence of any liens.

(B) In the case of a property subject to more than 1 lien, a lien that has been avoided shall not be considered in making the calculation under subparagraph (A) with respect to other liens.

(C) This paragraph shall not apply with respect to a judgment arising out of a mortgage foreclosure.

Section 522(f).

Section 522(f) permits a debtor to avoid a judicial lien if it impairs a homestead exemption, such as the exemption claimed by Debtors under N.M.S.A. § 42-10-9(B)(1). *See, e.g., In re Hamilton*, 461 B.R. 878, 883 (Bankr. D.N.M. 2011) (discussing the New Mexico homestead exemption and § 522(f)).

Under the Bankruptcy Code, the only requirements for lien avoidance are those found in § 522(f). To meet the statutory requirements, Debtors must prove the existence of a judicial lien; that the lien impairs their homestead exemption; and that they possessed the homestead property when the lien attached. *See Farrey v. Sanderfoot*, 500 U.S. 291, 295-96 (1991). Leaving the subject judicial liens in place, as the Vigils and the Moras advocate, effectively would deny Debtors their right to the homestead exemption.

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MEMORANDUM POINTS & AUTHORITIES

United States Supreme Court *Law v. Siegel*, 571 U.S. 415 (2014)

The United States Supreme Court addressed a similar argument in *Law v. Siegel*, 571 U.S. 415 (2014). It ruled that the Bankruptcy Code does not confer “a general, equitable power in bankruptcy courts to deny exemptions based on a debtor's bad-faith conduct.” *Id.* at 425.

A bankruptcy court has statutory authority to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of” the Bankruptcy Code. 11 U.S.C. § 105(a).

And it may also possess “inherent power ... to sanction ‘abusive litigation practices.’ ” *Marrama v. Citizens Bank of Mass.*, 549 U.S. 365, 375–376, 127 S. Ct. 1105, 166 L. Ed. 2d 956 (2007). But in exercising those statutory and inherent powers, a bankruptcy court may not contravene specific statutory provisions.

It is hornbook law that § 105(a) “does not allow the bankruptcy court to override explicit mandates of other sections of the Bankruptcy Code.” 2 Collier on Bankruptcy ¶ 105.01[2], p. 105–6 (16th ed. 2013).

Section 105(a) confers authority to “carry out” the provisions of the Code, but it is quite impossible to do that by taking action that the Code prohibits. That is simply an application of the axiom that a statute's general permission to take actions of a certain type must yield to a specific prohibition found elsewhere. See *Morton v. Mancari*, 417 U.S. 535, 550–551, 94 S. Ct. 2474, 41 L. Ed. 2d 290 (1974); *D. Ginsberg & Sons, Inc. v. Popkin*, 285 U.S. 204, 206–208, 52 S. Ct. 322, 76 L. Ed. 704 (1932).

Courts’ inherent sanctioning powers are likewise subordinate to valid statutory directives and prohibitions. *Degen v. United States*, 517 U.S. 820, 823, 116 S. Ct. 1777, 135 L. Ed. 2d 102 (1996); *Chambers v. NASCO, Inc.*, 501 U.S. 32, 47, 111 S. Ct. 2123, 115 L. Ed. 2d 27 (1991).

We have long held that “whatever equitable powers remain in the bankruptcy courts must and can only be exercised within the confines of” the Bankruptcy Code. *Norwest Bank Worthington v. Ahlers*, 85 U.S. 197, 206, 108 S. Ct. 963, 99 L. Ed. 2d 169 (1988); see, e.g., *Raleigh v. Illinois Dept. of Revenue*, 530 U.S. 15, 24–25, 120 S. Ct. 1951, 147 L. Ed. 2d 13 (2000); *United States v. Noland*, 517 U.S. 535, 543, 116 S. Ct. 1524, 134 L. Ed. 2d 748 (1996);

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1 *SEC v. United States Realty & Improvement Co.*, 310 U.S. 434, 455, 60 S. Ct. 1044, 84 L. Ed.
2 1293 (1940).571 U.S. at 420-421 (footnote omitted).

3 The 10th Circuit summarized *Siegel*'s effect on § 522(f) lien avoidance: *Siegel* recognized
4 that a bankruptcy court has broad equitable powers under § 105 "to issue any order ... necessary
5 or appropriate to carry out the provisions of the Bankruptcy Code" and has "inherent power to
6 sanction abusive litigation practices." 134 S.Ct. at 1194 (ellipsis and internal quotation marks
7 omitted). But it also said any equitable powers possessed by "the bankruptcy courts must and can
8 only be exercised within the confines of the Bankruptcy Code," *id.* (internal quotation marks
9 omitted), and "§ 522 does not give courts discretion to grant or withhold exemptions based on
whatever considerations they deem appropriate," *id.* at 1196.

10 "[T]he court may not refuse to honor the [§ 522] exemption absent a valid statutory basis
11 for doing so," nor may it add exceptions not found in the statute. *Id.* The Court noted that
12 bankruptcy courts retain "authority to respond to debtor misconduct with meaningful
13 sanctions[.]" including authority to deny a dishonest debtor discharge, *id.* at 1198, but made clear
14 that "federal law provides no authority for bankruptcy courts to deny an exemption on a ground
15 not specified in the Code," *id.* at 1197 (emphasis omitted).

16 *Clabaugh v. Grant (In re Grant)*, 658 Fed. App'x. 411, 414 (10th Cir. 2016). For other decisions
17 consistent with *Clabaugh*, see *Rockwell v. Rockwell (In re Rockwell)*, 968 F.3d 12, 19 (1st Cir.
18 2020) (citing *Siegel*, the court held it was prohibited from infringing on debtor's "fresh start" by
19 denying exemptions); *Rucker v. Belew (In re Belew)*, 943 F.3d 395, 396 (8th Cir. 2019)
20 ("Because bad faith is not listed among the 'carefully calibrated exceptions' in § 522, the
[Supreme] Court concluded general powers could not be used to recognize a bad faith exception
21 not listed in the specific, detailed provisions of that section."); *Ellman v. Baker (In re Baker)*,
22 791 F.3d 677 (6th Cir. 2015) ("[I]t is clear that *Siegel* prohibits the bankruptcy court from
23 disallowing the debtors' claimed exemptions because of their alleged bad faith and fraudulent
conduct."); *Elliott v. Weil (In re Elliott)*, 544 B.R. 421, 432 (9th Cir. BAP 2016) ("*Law v. Siegel*
24 abrogated our authority to deny exemptions or amendments to exemptions based on a debtor's
25 bad faith."); *Gray v. Warfield (In re Gray)*, 523 B.R. 170, 174 (9th Cir. BAP 2014) ("[T]he
26 Bankruptcy Code does not grant bankruptcy courts the 'authority to disallow an exemption ...'
27 based on a debtor's misconduct."); *In re Bushey*, 559 B.R. 766, 775-776 (Bankr. D.N.M. 2016)

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1 (“The Bankruptcy Code does not confer any general, equitable power in the bankruptcy court to
2 deny a debtor's exemptions based on bad-faith conduct.”); *In re Jacobs*, 662 B.R. 376, 385 n.37
3 (Bankr. N.D. Okla. 2024) (same); *In re Guzman*, 660 B.R. 149, 156 (Bankr. D. Colo. 2024) (to
4 the same effect); *In re Bentley*, 622 B.R. 296, 302 (Bankr. W.D. Okla. 2020) (the court cannot
5 use general equitable powers to deny exemption claims as a result of Debtor's alleged bad faith
6 conduct); *In re Schepmann*, 2020 WL 714414 (Bankr. D. Kan. 2020) (citing *Siegel*, the court
7 held that it may not condition debtor's right to amend a homestead exemption claim on debtor's
8 good faith); *In re Stewart*, 2017 WL 3575698, at *6 (Bankr. W.D. Okla.) (Bankruptcy Code does
9 not confer a “general equitable power in bankruptcy courts to deny exemptions based on debtor's
10 bad faith conduct”); *In re Liao*, 553 B.R. 584, 603 (Bankr. S.D. Tex. 2016) (“[T]here is no
11 equitable power under federal law to stop the Debtor, however unsavory his conduct has been,
12 from exempting the [homestead].”); see generally 4 *Collier on Bankruptcy*, ¶522.12[7] (16th Ed.)
13 (“Following the decision in *Law v. Siegel*, courts have concluded that they may not use their
14 equitable powers to deny a debtor the right to amend exemptions based on bad faith or other
15 misconduct.”).

15 To deny Debtors’ § 522(f) motions because the subject judicial liens allegedly secure
16 debts procured by fraud would run afoul of *Siegel* and *Clabaugh*, by which the Court is bound,
17 as well as the other authority cited above.⁴ To rule in the Lienholders’ favor the Court would
18 have to use its § 105 powers to create an equitable exception to § 522(f) not found in the Code.
19 The case law discussed above prohibits the Court from doing so.

20 Further, alleged defrauded creditors (secured and unsecured) have the right under §
21 523(a)(2) to have their debts declared nondischargeable which apparently the Houser Bros.,
22 Gables HOA, and Ms. Jasso has done by filing their adversary complaint(s) in October 2021.
23 Debtor’s discharge was denied.

24 Between *Law v. Siegel* and § 523(a)(2), the DEBTOR respectfully requests her Motion be
25 granted in full under § 522(f).

26 **Debtor reviewed page 4 that Gables HOA states is BLANK.** The way that Debtor
27 reads page 4, it appears to be a Worksheet the “Court” completes, not the Movant.

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1 Gables HOA is mistaken about the 522(f) previously filed. Since that Motion is not
2 before the Court, Debtor will not comment on that Motion and the Court on its own Motion took
3 the hearing Debtor scheduled off Calendar.

4
5 I declare under penalty of perjury of the laws of these United States, the foregoing to be
6 true and correct.

7 Dated this 10th day of December, 2024 at Huntington Beach, CA 92649
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10 JAMIE LYNN GALLIAN
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REQUEST FOR JUDICIAL NOTICE

Federal courts may take judicial notice of facts which are “capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.”

Federal Rule of Evidence 201(c)(2). This includes proceedings in other courts, both within and without the federal judicial system, if those proceedings have a direct relation to the matters at issue. U.S. ex rel. Robinson Rancheria Citizens Council v. Borneo, Inc., 971 F.2d 244, 248 (9th Cir. 1992). The court may also take judicial notice of undisputed facts that are contained in extrinsic materials, such as public land records. See Mir v. Little Co. of Mary Hosp., 844 F.2d 646, 649 (9th Cir. 1988). Based on the foregoing, the HOA requests the Court take judicial notice of the following:

1. A true and correct copy of a search California Secretary of State’s official records of UCC liens of record with respect to Creditor **JAMIE LYNN GALLIAN** is attached hereto and incorporated herein as Exhibit “A.”

2. A true and correct copy of a search California Secretary of State’s official records of UCC liens of record 197691916827, with respect to Creditor **JAMIE LYNN GALLIAN** is attached hereto and incorporated herein as Exhibit “B.”

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Secretary of State

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UCC Documents have been processed through: 12/05/2024

Disclaimer: This tool allows you to search the California Secretary of State's Uniform Commercial Code database for abstracts of information for lien notices that have been filed with this office. The UCC Search is updated as documents are filed. The data provided is not a complete or certified record.

JAMIE LYNN GALLIAN

Advanced

1

Results: 13

UCC Type	Debtor Information	File Number	Secured Party Info	Status
UCC	J-SANDCASTLE CO LLC - HUNTINGTON BEACH, CA	197691916827	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	Active
UCC	J-SANDCASTLE CO LLC - HUNTINGTON BEACH, CA	U210084251729	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	Active
UCC	J-SANDCASTLE CO LLC - HUNTINGTON BEACH, CA	U210084251830	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	Active
UCC	J-SANDCASTLE CO LLC - HUNTINGTON BEACH, CA	U210084251931	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	Active
UCC	J-SANDCASTLE CO LLC - HUNTINGTON BEACH, CA	U210084255829	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	Active

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UCC	>	J-SANDCASTLE CO LLC - HUNTINGTON BEACH, CA	U210088103427	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	Active
UCC	>		U240065129627	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	Active
UCC	>	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	197691905279	J-PAD, LLC - CA SOS ENTITY NO. 201804010750 - ORANGE, CA	Active
UCC	>	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	197691915674	J-PAD, LLC - CA SOS ENTITY NO. 201804010750 - ORANGE, CA	Lapsed
UCC	>	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	U210084558226	STEVEN D. GALLIAN - CORONA DEL MAR, CA	Active
UCC	>	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	U220187699844		Active
UCC	>	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	U220187704331		Lapsed
UCC	>	JAMIE LYNN GALLIAN - HUNTINGTON BEACH, CA	U220187705223		Active

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) Jamie Gallian 714-321-3449
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address) Jamie Lynn Gallian 16222 Monterey Ln #376 Huntington Beach, CA 92649 USA

DOCUMENT NUMBER: 76027940003
FILING NUMBER: 19-7691916827
FILING DATE: 01/14/2019 09:10

IMAGE GENERATED ELECTRONICALLY FOR WEB FILING
THE ABOVE SPACE IS FOR CA FILING OFFICE USE ONLY

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the Individual Debtor information in Item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	1a. ORGANIZATION'S NAME J-SANDCASTLE CO LLC			
	1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
1c. MAILING ADDRESS 16222 MONTEREY LN #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649
			COUNTRY USA	

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the Individual Debtor information in Item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	2a. ORGANIZATION'S NAME			
	2b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
2c. MAILING ADDRESS		CITY	STATE	POSTAL CODE
				COUNTRY

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

OR	3a. ORGANIZATION'S NAME J-Pad, LLC - CA SOS Entity No. 201804010750			
	3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
3c. MAILING ADDRESS 2702 N GAFF ST		CITY ORANGE	STATE CA	POSTAL CODE 92665
				COUNTRY USA

4. COLLATERAL: This financing statement covers the following collateral:
LOCATED ON PROPERTY RECORDED IN ORANGE COUNTY CLERK RECORDERS OFFICE IN CALIFORNIA PARCEL MAP
RECORDED IN BOOK 108, PG(S) 47-48.

ASSESSORS PARCEL NUMBER 891-569-62
SERIAL NUMBERS AC7V710394GB, AC7V710394GA; DECAL NUMBER LBM1081

5. Check only if applicable and check only one box: Collateral is ☐ held in a Trust (see UCC1Ad, Item 17 and Instructions) ☐ being administered by a Decedent's Personal Representative

6a. Check only if applicable and check only one box: ☐ Public-Finance Transaction ☒ Manufactured-Home Transaction ☐ A Debtor is a Transmitting Utility

6b. Check only if applicable and check only one box: ☐ Agricultural Lien ☐ Non-UCC Filing

7. ALTERNATIVE DESIGNATION (if applicable): ☐ Lessee/Lessor ☐ Consignee/Consignor ☐ Seller/Buyer ☐ Bailee/Bailor ☐ Licensee/Licensor

8. OPTIONAL FILER REFERENCE DATA:

FILING OFFICE COPY

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UCC FINANCING STATEMENT ADDENDUM

FOLLOW INSTRUCTIONS

9. NAME OF FIRST DEBTOR: Same as line 1a or 1b on Financing Statement; if line 1b was left blank because individual Debtor name did not fit, check here <input type="checkbox"/>	
OR	9a. ORGANIZATION'S NAME J-SANDCASTLE CO LLC
	9b. INDIVIDUAL'S SURNAME
	FIRST PERSONAL NAME
ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX

DOCUMENT NUMBER: 76027940003

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10. DEBTOR'S NAME: Provide (10a or 10b) only <u>one</u> additional Debtor name or Debtor name that did not fit in line 1b or 2b of the Financing Statement (Form UCC1) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name) and enter the mailing address in line 10c					
OR	10a. ORGANIZATION'S NAME				
	10b. INDIVIDUAL'S SURNAME				
	INDIVIDUAL'S FIRST PERSONAL NAME				
	INDIVIDUAL'S ADDITIONAL NAME(S)/INITIAL(S)				
				SUFFIX	
10c. MAILING ADDRESS		CITY	STATE	POSTAL CODE	COUNTRY
11. <input type="checkbox"/> ADDITIONAL SECURED PARTY'S NAME or <input checked="" type="checkbox"/> ASSIGNOR SECURED PARTY'S NAME: Provide only <u>one</u> name (11a or 11b)					
OR	11a. ORGANIZATION'S NAME				
	11b. INDIVIDUAL'S SURNAME GALLIAN	FIRST PERSONAL NAME JAMIE	ADDITIONAL NAME(S)/INITIAL(S) LYNN		SUFFIX
11c. MAILING ADDRESS 16222 MONTEREY LANE #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649	COUNTRY USA
12. ADDITIONAL SPACE FOR ITEM 4 (collateral):					
13. <input type="checkbox"/> This FINANCING STATEMENT is to be filed [for record] (or recorded) in the REAL ESTATE RECORDS (if applicable)			14. This FINANCING STATEMENT: <input type="checkbox"/> covers timber to be cut <input type="checkbox"/> covers as-extracted collateral <input type="checkbox"/> is filed as a fixture filing.		
15. Name and address of RECORD OWNER of real estate described in item 16 (if Debtor does not have a record interest):			16. Description of real estate:		
17. MISCELLANEOUS:					

FILING OFFICE COPY

STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CERTIFICATE OF TITLE

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model		DOM	DFS	RY
90002 SKYLINE HOMES INC	CUSTOM VILLA			05/29/2014	07/28/2014	
Serial Number	Label/Inslogia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Aug 03, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

Addressee

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Registered Owner(s)

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

I hereby certify that this copy is a true and correct copy of
the original document on file with the Department of
Housing & Community Development.



Signature

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12313525

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REGISTRATION CARD

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model	DOM 05/29/2014	DFS 07/28/2014	RY	Exp. Date
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Aug 03, 2021	

Addressee

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649



Registered Owner(s)

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

ATTENTION OWNER:

THIS IS THE REGISTRATION CARD FOR THE
UNIT DESCRIBED ABOVE. PLEASE KEEP THIS
CARD IN A SAFE PLACE WITHIN THE UNIT.

INSTRUCTIONS FOR RENEWAL:

Jamie Lynn Gallian
REGISTRATION FOR THIS UNIT EXPIRES ON THE
DATE INDICATED ABOVE IN THE BOX LABELED
"Exp. Date". THERE ARE SUBSTANTIAL
PENALTIES FOR DELINQUENCY. IF YOU DO NOT
RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS
PRIOR TO THE EXPIRATION DATE, CONTACT
H.C.D. FOR RENEWAL INSTRUCTIONS.

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12313525

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STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS

GAVIN NEWSOM, Governor



Title Search

Date Printed: Aug 8, 2024

Decal #: LBM1081 Use Code: SFD
Manufacturer: SKYLINE HOMES INC - CLOSED Original Price Code: BVH
Tradename: CUSTOM VILLA Rating Year:
Model: Tax Type: LPT
Manufactured Date: 05/29/2014 Last ILT Amount:
Registration Exp: Date ILT Fees Paid:
First Sold On: 07/28/2014 ILT Exemption: NONE

Serial Number	HUD Label / Insignia	Length	Width
AC7V710394GA	PFS1130282	60'	15' 2"
AC7V710394GB	PFS1130281	56'	15' 2"

Record Conditions:

- An application for title or registration change is pending with the department. For information regarding this application, please call 1-800-952-8356 and request to speak with a customer representative.

Registered Owner:

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Last Title Date: 08/12/2021
Last Reg Card: 08/12/2021
Sale/Transfer Info: Price \$.00 Transferred on 02/25/2021

Situs Address:

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Situs County: ORANGE

Title Searches:

CHRIS HOUSER
16222 MONTEREY LN OFC
HUNTINGTON BEACH, CA 92649

Title File No: None

END OF TITLE SEARCH

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 16222 MONTEREY LANE SPACE 375 HUNTINGTON BEACH, CA 92649

A true and correct copy of the foregoing document entitled (*specify*): DEBTORS REPLY TO HOA OPPOSITION TO 522(F) And Request For Judicial Notice In Support will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) DEC 10, 2024 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (*date*) I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DECEMBER 10, 2024

Date

Joseph Clark

Printed Name

Joseph Clark

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

- **Bradford Barnhardt** bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, alinares@ecf.courtdrive.com
- **Aaron E. DE Leest** adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com
- **Robert P Goe** kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com; Goe.RobertP.R@notify.bestcase.com
- **Jeffrey I Golden (TR)** lwerner@go2.law, jig@trustesolutions.net; kadele@go2.law; C205@ecfcbis.com
- **D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com; alinares@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
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- **Eric P Israel** eisrael@danninggill.com, danninggill@gmail.com; eisrael@ecf.inforuptcy.com
- **Shantal Malmed** shantal.malmed@gmlaw.com, cheryl.caldwell@gmlaw.com
- **Laila Masud** lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
- **Mark A Mellor** mail@mellorlawfirm.com, mellormr79158@notify.bestcase.com
- **Valerie Smith** claims@recoverycorp.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov